

EXHIBIT 31



COWAN,
DeBAETS,
ABRAHAMS &
SHEPPARD LLP

41 MADISON AVENUE
NEW YORK, NY 10010
T: 212 974 7474
F: 212 974 8474
www.cdas.com

NANCY E. WOLFF
212-974-7474
NWOLFF@CDAS.COM

JEAN ALBERT
FREDERICK P. BIMBLER
SUSAN H. BODINE
ANDREA F. CANNISTRACI
CAITLIN DiMOTTA ■ □ ♣
ROBERT J. EPSTEIN
BRIANA HILL ■
DOUGLAS P. JACOBS*
BENJAMIN JAFFE
ELLIS B. LEVINE
SARAH C. ODENKIRK † ♦ □ ♣
SIMON N. PULMAN* ○
JOSHUA B. SESSLER
J. STEPHEN SHEPPARD ♦
SCOTT J. SHOLDER*
KENNETH N. SWEZEY †
NANCY E. WOLFF* †

ELIZABETH ALTMAN
POONEH AMINIAN ■
CECE COLE
JOSHUA M. GREENBERG
DANIEL SHEERIN ■
AMY STEIN
ALEX STOLLS
KATHERINE WILCOX

COUNSEL:
BENJAMIN HALPERIN

SPECIAL COUNSEL:
ALEX GIGANTE

TIMOTHY J. DeBAETS
(1949-2020)
PHILIP M. COWAN
(1943-2001)
HOWARD ABRAHAMS
(1945-1996)

■ ADMITTED IN CA
† ALSO ADMITTED IN CA
♦ ALSO ADMITTED IN DC
○ ALSO ADMITTED IN GA
* ALSO ADMITTED IN NJ
● ALSO ADMITTED IN PA
□ ALSO ADMITTED IN WA
❖ ALSO ADMITTED IN OR
♣ ALSO ADMITTED IN NM

BEVERLY HILLS OFFICE:
9454 WILSHIRE BLVD, SUITE 901
BEVERLY HILLS, CA 90212
T: 310 340.6334

February 9, 2022

VIA Email (mark@csrlawyers.com)

Mark D. Passin
CSReeder, PC
11766 Wilshire Boulevard, Ste 1470
Los Angeles, CA 90025

Re: Lynn Freeman/Emily Sylvan Kim

Dear Mr. Passin:

We represent Entangled Publishing, LLC and write in response to your letter of February 7, 2022, in which you assert that the Crave book series written by Tracy Deebbs-Elkenaney (p/k/a Wolff) and published by Entangled Publishing infringes on a manuscript entitled *Blue Moon Rising* written by your client Lynn Freeman between approximately 2010 through 2014. While your letter describes in great detail your client's relationship with her former agent Emily Sylvan Kim of Prospect Agency, LLC, including the number of rounds of manuscript revisions requested of her, it is telling that your letter is silent as to any substantial similarity between your client's unpublished manuscript and the Crave book series. Instead, your letter is based wholly on the unsubstantiated assumption that Freeman's literary agent, Kim, must have provided Freeman's manuscript to Wolff. However, this assumption is speculative, unfounded, and easily rebutted as fanciful.

I should not need to remind you of your Rule 11 responsibility to investigate the facts before filing any claim. Had you searched for information on Entangled Publishing and the Founder, CEO and Publisher Liz Pelletier, you would note that Entangled Publishing has a unique business model, known for "thinking outside the box." Entangled Publishing's success is in part due to its unique approach to publishing by taking an active role in the creation and marketing of its books, looking at industry trends and market research.

In this instance, Pelletier created the basic storyline for the Crave book series, selecting the writer, Tracy Wolff, not based on a prepared manuscript but due to her writing voice. The Crave book series was a collaborative project with Pelletier providing to Wolff in writing the main plot, location, characters, and scenes, and actively participating in the editing and writing process. Notably, neither Pelletier nor Wolff ever heard of Freeman, read her ten-year old manuscript nor were aware of any details concerning the Freeman work. The agent, Kim, recalls nothing of this manuscript, but regardless, Kim, had no creative input on the Crave book manuscripts in any manner.





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As you know, it is your burden in bringing any copyright claim to establish access (which you cannot) and substantial similarity (which you have not). In determining substantial similarity with literary works, courts will only compare, side by side, copyrightable expression, eliminating all unprotected aspects of a literary work such as stock characters, settings, or events that are common to a particular subject matter or medium. Copyright does not protect ideas, only expression of ideas, and many popular romance novels contain supernatural creatures. Such stock elements are not protectable.

Based on the above, your demand for correspondence, financial records, and confidential agreements between and from Entangled Publishing, Macmillan, Tracy Wolff, Emily Sylvan Kim, as well as agreements with Universal City Studios is unwarranted and clearly an inappropriate fishing expedition. Further, there is no basis for anyone to sign a tolling agreement as you have not established a valid claim of copyright infringement or demonstrated that there is any actionable similarity in copyrightable elements. Please be clear that if you should choose to bring what we believe to be a frivolous claim against our client or its distributors, agents, and partners, we will vigorously defend our client's right to publish and create derivative works based on the Crave book series and will seek attorney's fees under the Copyright Act as the prevailing party.

This letter is not intended to be a full recitation of the facts or the law. All our client's rights, remedies and defenses are expressly reserved.

Sincerely,

A handwritten signature in black ink that reads 'Nancy E. Wolff'. The signature is written in a cursive, flowing style.

Nancy E. Wolff

Cc: Ellis Levine, Esq.
Paul J. Slevin, Esq.
Christopher Miller, Esq.
Emily Sylvan Kim
Tracy Deebs-Elkenaney
Liz Pelletier